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OFFICE OF THE SECRETARY

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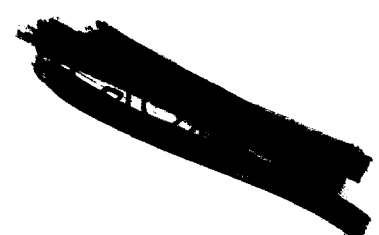
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EX PARTE PRESENTATION

January 27, 1999

VIA HAND DELIVERY

Magalie Salas, Esquire
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554



Re: Ex Parte Presentation in:

ET Docket No. 95-18

IB Docket No. 96-132 ✓

ICO Services Limited (File No. 188-SAT-Lo1-97)

Inmarsat Horizons (File No. 190-SAT-Lo1-97)

Iridium, LLC (File No. 187-SAT-P/LA-97 (96))

Globalstar, L.P. (File No. 182-SAT-P/LA-97 (64))

Mobile Communications Holdings, Inc. (File No. 180-SAT-P/LA-97 (26))

Constellation Communications, Inc. (File No. 189-SAT-Lo1-97)

TMI Communications and Company, L.P. (File No. 189-SAT-Lo1-97).

The Boeing Company (File No. 179-SAT-P/LA-97(16), 90-SAT-AMEND-98)

Celsat, Inc. (File No. 26/27/28-DSS-P/LA-97 & 88-SAT-AMEND-98)



Dear Ms. Salas:

In accordance with Section 1.206 of the Commission's Rules, we hereby advise you that representatives of Iridium LLC met with a Commission official yesterday to discuss options for assignment of spectrum in the Mobile-Satellite Service between 1 and 3 GHz. Meeting participants were Paul Misner, Senior Legal Advisor and Chief of Staff for Commissioner Furchtgott-Roth, and Charles Rush and Audrey Allison of Iridium, LLC.

The meeting briefly reviewed licensing options outlined by the International Bureau in a previous meeting with the 2 GHz MSS applicants. Iridium repeated its concern that none of these options addresses the issue of how the entities that receive their space segment licenses from the U.S. will be able to access 2 GHz spectrum in Europe. The meeting also addressed Iridium's continuing efforts to develop an industry-led global MSS band plan that would consider MSS spectrum beyond 2 GHz, including spectrum at issue in IB Docket No. 96-132, to ensure a fair and competitive environment in which like MSS systems have access to like amounts of spectrum between 1 and 3 GHz.

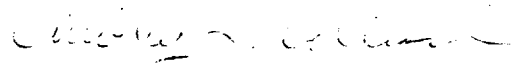
Iridium distributed documents summarizing its views on the International Bureau 2 GHz licensing options and the industry-driven global MSS band plan.

Two copies of this statement and attached documents are being submitted for each docket and application file number noted above.

Should any questions arise concerning this matter, please communicate directly with the undersigned.

Very truly yours,

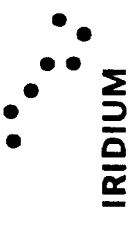
IRIDIUM LLC



Audrey L. Allison
Counsel, Regulatory Matters

Enclosure

cc (w/ encl): Paul Misener



Comments on FCC Preliminary Views on 2 GHz Licensing Options

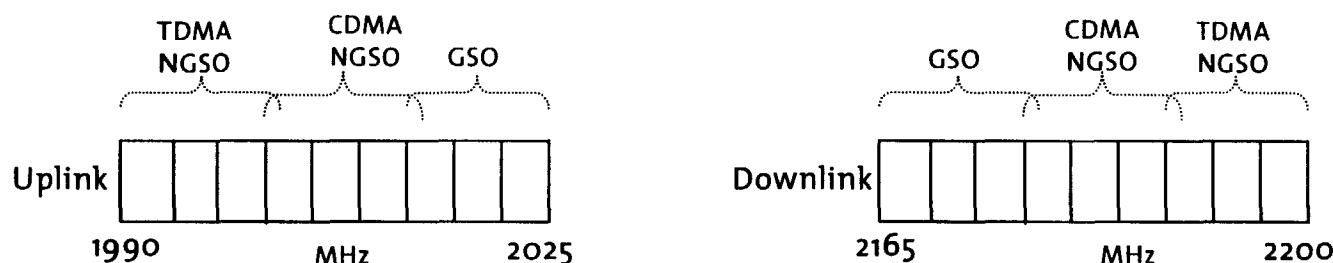
January 1999



Current FCC Options on 2 GHz MSS Spectrum Allocation

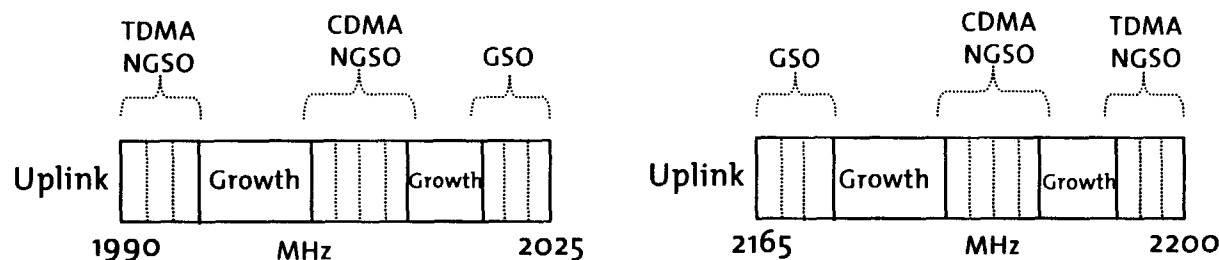
- Option 1 - Traditional Band Arrangement
- Option 2 - Flexible Band Arrangement
- Option 3 - Post-licensing Coordination Approach
- Option 4 - Competitive Bidding

Option 1 - Traditional Band Arrangement



- Under this option each of the nine applicants would receive 2x3.75 MHz of spectrum
 - Spectrum for CDMA applicants would be grouped to allow contiguous CDMA spectrum
 - GSO applicants would be put into Region 2 only spectrum
 - Joint TDMA/CDMA applicants (Iridium and Globalstar) would need to state how much of their 2x3.75 MHz would be TDMA and how much would be CDMA

Option 2 - Flexible Band Arrangement



- Under this option each applicant would initially receive 2x2.5 MHz in “core bands” - additional “growth” spectrum can be obtained as need is established by individual provider
 - Spectrum for CDMA applicants would be grouped to allow contiguous CDMA core spectrum
 - GSO applicants would be put into Region 2 only core spectrum
 - Joint TDMA/CDMA applicants (Iridium and Globalstar) must decide on proportions



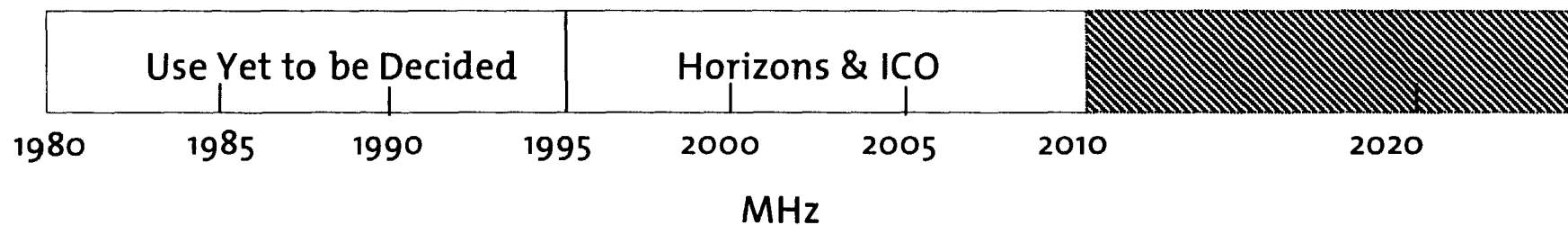
Option 3 - Post-licensing Coordination and Option 4 - Competitive Bidding

- **Post-licensing Coordination**
 - Each applicant would be authorized to operate across the entire 2x35 MHz in the US and would coordinate the usage of the band much like the current Inmarsat coordination process.
- **Competitive Bidding**
 - Basic idea would be to breakup up the 2 GHz MSS spectrum into 28 2.5 MHz blocks and auction each.

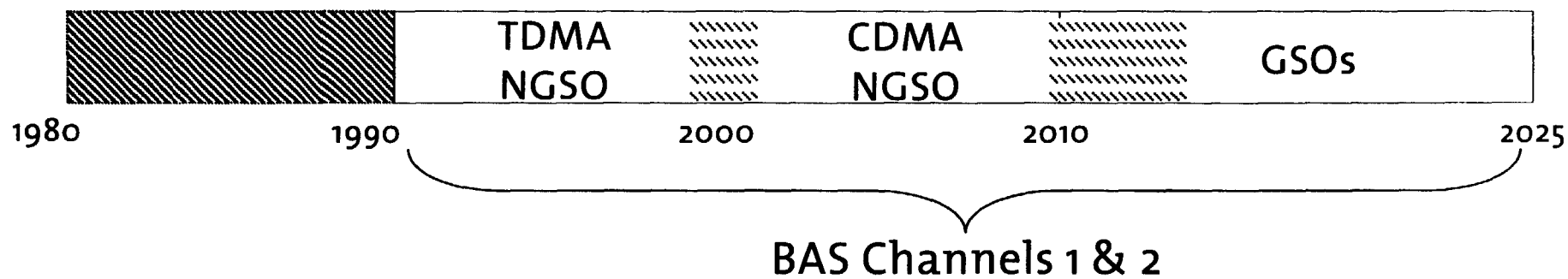


2 GHz MSS Uplink Band Assignments - Illustration

European Band Plan



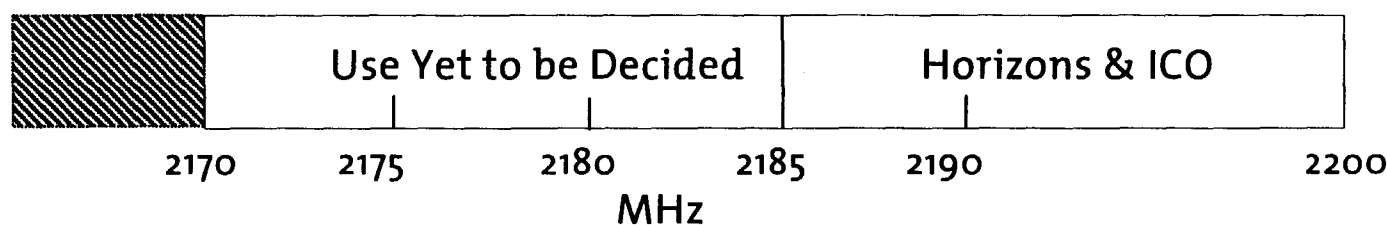
FCC Options 1 & 2



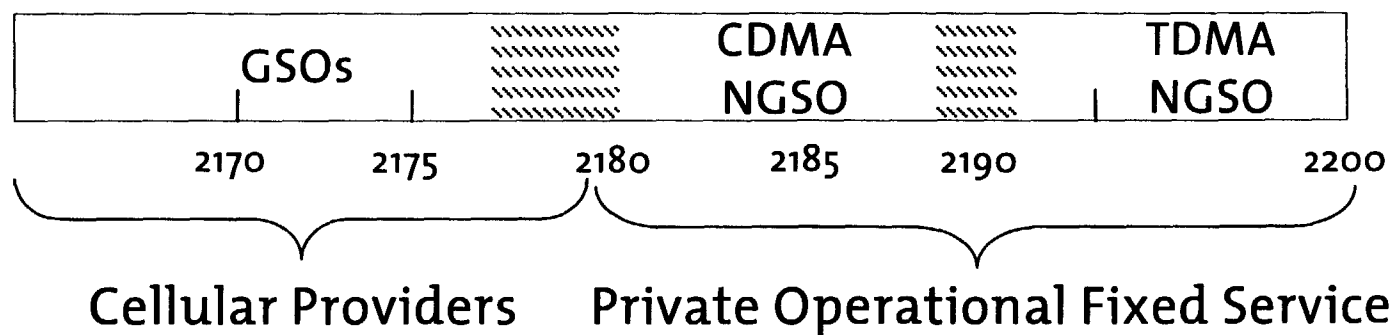


2 GHz MSS Downlink Band Assignments - Illustration

European Band Plan



FCC Options 1 & 2





Industry-driven Global MSS Band Plan

January/February 1999



Purpose of Band Plan

To bring about a fair competitive environment by establishing an industry-driven global MSS frequency coordination process that provides for equitable access to spectrum.



Current Situation

Disproportionate control of global MSS
spectrum by IGOs and affiliates

Assignment of MSS spectrum not market driven
and stifles competition

Current Control of Global MSS Spectrum Between 1-3 GHz



CEPT
Band Plan
at 2 GHz



ICO Band

Inmarsat 1.5/1.6 GHz Band

CDMA
Big LEO



Control of Spectrum

Inmarsat/ICO - 75%

CDMA Big LEO - 21%

Iridium - 4%

ICO enjoys
5-to-1 spectrum
advantage over
Iridium!!



MSS Market Share and Spectrum Trend

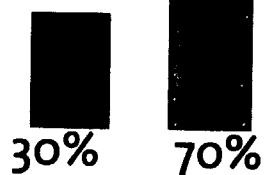
MARKET SHARE

CONTROL of GLOBAL
MSS SPECTRUM

TODAY



2005



■ Inmarsat & ICO
■ US 1st
Generation
Big LEOs

1/27/99



**Current FCC 2 GHz licensing proceeding
is not likely to create global solution**

**Limited spectrum available at 2 GHz for global MSS
systems**

**CEPT band plan effectively blocks access to 2 GHz
spectrum by any US MSS system prior to 2005**

**FCC 2 GHz proceeding will be long and contentious and
is not likely to result in equitable spectrum
arrangements for all credible applicants**



The timing is right to pursue a more equitable MSS frequency band plan

- Privatization
 - Inmarsat - controlling the largest amount of MSS spectrum - will be privatized by mid-1999
- Licensing
 - FCC MSS ongoing licensing processes
 - CEPT MSS band plan and milestone review
- EU-US Harmonization
 - Recent TABD communiqué called on US and EU governments to establish “...a formal harmonization process for radio frequency assignments to enable a fair competitive environment...”



Spectrum Assignment Principles

- **Mobile satellite services will continue to be provided for the foreseeable future by regional and global system operators**
- **Access to spectrum is the key element for market entry and competition in radio-based telecommunications services**
- **Industry-led efforts with support from regulators are the best way to accomplish fair and equitable access to spectrum worldwide**
- **Transitional arrangements are needed to assure access to spectrum for current MSS systems expected to continue operations through 2005 and beyond**



Industry- driven MSS band plan will result in frequency use consistent with market forces

Circa 2005 MSS systems can be accommodated in current 1.5/1.6 GHz, Big LEO and 2 GHz MSS bands

MSS systems are being designed and built that are more spectrally efficient

Lead time available to obtain MSS spectrum for systems coming into operation post 2005

AMSS will not be adversely impacted



Next Steps

Support of major MSS industry participants

Regulator support for Band Plan